

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

General Communications, Inc. Request
for Waiver of Certain Requirements in
the upper 6 GHz Bands

)
)
)
)
)
)
)

WT Docket No. 16-209

To: The Commission

Comments of EIBASS

Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS) hereby respectfully submits its comments in the above-captioned public notice relating to a waiver request by General Communications, Inc. (GCI) for point-to-point microwave stations in the "upper 6 GHz bands" in Alaska.

I. "Upper 6 GHz Bands" Includes the 7 GHz TV BAS Band

1. GCI asks for waivers for its proposed use in Alaska of 6,425–6,525 MHz, 6,525–6,875 MHz, and 6,875–7,125 MHz, to allow use of 60 MHz wide channels and fixed, point-to-point links. Normally 6,425–6,525 MHz is reserved only for mobile use, not fixed, point-to-point use, and the maximum channel width at 6.5 GHz is 25 MHz. EIBASS has no objection to the requested waivers so long as the standard Section 101.103 prior coordination notice (PCN) protocols are followed. This is, after all, rural Alaska.

2. EIBASS even doesn't object to GCI's use of 6,875–7,125 MHz, the 7 GHz TV Broadcast Auxiliary Services (BAS) band, since in the WT Docket 10-153 "BAS Flexibility" rulemaking the 7 and 13 GHz TV BAS bands were opened to Part 101 fixed-link stations, subject to reasonable safeguards. However, EIBASS wishes the WT Docket 16-209 record to note that GCI has not requested waiver of Section 101.147(a), Note 34. Note 34 states that:

In the bands 6,875–7,125 MHz and 12,700–13,150 MHz, links shall not intersect with the service area of television pickup stations.

Further, EIBASS notes that GCI has not requested exemption from the restriction in Paragraph 24 of the August 9, 2011, *Report and Order, Further Notice of Proposed Rulemaking and Memorandum, and Memorandum, Opinion and Order* (R&O/FNPRM/MO&O) to WT Docket

EIBASS Comments: WT Docket 16-209, GCI Request for Waiver of Certain Requirements in the Upper 6 GHz Bands

10-153, which reserved TV BAS Channels B5 (6,975–7,000 MHz) and B6 (7,000–7,025 MHz) for BAS use only; that is, these two 7 GHz band channels remained protected (*i.e.*, non-shared with Part 101 stations), regardless of whether inside or outside the operational area of a 7 GHz band TV Pickup station. This reservation was again stated at Paragraph 28 of the R&O/FNPRM/MO&O, as follows:

The rules we adopt today will open most of the 7 and 13 GHz bands to FS over more than half of the nation's land mass where 10 percent of the population lives, while applying geographic restrictions on FS in those bands to minimize the potential for interference between FS facilities and TV Pickup stations. Specifically, as reflected in the rules in Appendix A, we will allow Part 101 FS stations to share the 7 and 13 GHz bands subject to the following conditions:

(1) We will not allow FS stations in the 7 and 13 GHz band to locate their paths within the service areas of any previously licensed co-channel TV Pickup station. [Bolding and italics added.]

(2) We will require FS operators to coordinate any new fixed links with TV Pickup stations within the appropriate coordination zones on any new fixed links.

(3) As we require in other bands that fixed BAS and CARS share with Part 101 fixed services, we will require all fixed BAS, fixed CARS and Part 101 stations in the 7 and 13 GHz bands to engage in the same frequency coordination process that we require of all Part 101 services.

(4) We will also reserve two 25-megahertz channels for BAS and CARS in the 7 GHz band (6975–7025 MHz) and two 25-megahertz channels in the 13 GHz band (13150–13200 MHz) nationwide to accommodate TV Pickup stations covering events that occur outside the license areas of local BAS and CARS operations. [Bolding and italics added.]

EIBASS would object to the un-reserving of these two 7 GHz TV BAS band channels for mobile electronic news gathering (ENG) purposes even in Alaska, since even a remote, rural area can be transformed in a matter of hours from a Category IV ENG market to a Category I or II ENG market if a news event of sufficient magnitude occurs.¹ But, since the GCI filing did not request

¹ As categorized by SBE, and as adopted in the July 3, 2002, ET Docket 95-18 Second R&O, the four categories of TV electronic news gathering (ENG) use are:

Category I: “Los Angeles” or “LA.” Extremely heavy use, mostly split channel. There is lots of itinerant use and channel borrowing and sharing; even so, seven channels aren’t enough.

Category II: “Metro.” Spectrum is heavily used, especially during the news hours. There is some split channel use, not a lot, and some itinerant use. There is regular channel borrowing and sharing.

Category III: “Light.” There is some electronic news gathering (ENG), some fixed link, maybe even some channels mostly vacant most of the time. Typically, a small-market, low-competition situation.

Category IV: “Rural.” ENG is unheard of, the use is for fixed, long-haul relays to small-market TV stations, to TV translator stations, and to cable television headends. In some areas not all channels are even used.

**EIBASS Comments: WT Docket 16-209, GCI Request for Waiver
of Certain Requirements in the Upper 6 GHz Bands**

any such exemption, there is no conflict. That is, since only waiver of subparts (j) to (l) of Section 101.147 was requested, and not subpart (a), Note 34, nor the WT Docket 10-153 Paragraph 24/28 restrictions, EIBASS doesn't see a problem with the GCI waiver request.

II. Summary

3. So long as GCI adheres to the regular Section 101.103 PCN protocols, EIBASS has no objection to the requested waivers, given the rural Alaska venue. However, no waiver of Section 101.147(a), Note 34, was requested by GCI, meaning that no microwave paths would be allowed to intersect the operational area of record of any 7 GHz band TV Pickup station. And no exemption to Paragraphs 24/28 of the WT Docket 10-153 R&O/FNPRM/MO&O was requested, meaning that 6,975–7,025 MHz (TV BAS Channels B5 and B6) would remain unavailable for GCI's use.

Respectfully submitted,

/s/ Dane E. Ericksen, P.E., CSRTE, 8-VSB, CBNT
EIBASS Co-Chair
Consultant to Hammett & Edison, Inc.
Sonoma, CA

/s/ Richard A. Rudman, CPBE
EIBASS Co-Chair
Remote Possibilities
Santa Paula, CA

July 15, 2016

EIBASS
18755 Park Tree Lane
Sonoma, CA 94128
707/996-5200
dericksen@h-e.com